



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

November 16, 2020

**By ECF**

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Winnis Brito,  
20 Cr. 563 (JPO)

Dear Judge Oetken:

On October 28, 2020, Winnis Brito was arrested in connection with the above-captioned case. Brito is currently on parole in connection with a December 9, 2014 conviction for criminal possession of a loaded firearm in violation of New York Penal Law § 265.03(3). Because Brito's arrest in the instant case, as well as the location of his arrest, triggered parole violations that would typically result in the issuance of a parole warrant, Brito has been detained on consent since October 28, 2020. The supervisor of Brito's parole officer however, recently confirmed to both the Government and the defendant that, due to rising numbers of COVID-19, he does not intend to issue a warrant related to Brito's parole violations.

Accordingly, the Government and Brito's counsel jointly propose to the Court that Brito be released from custody on the following conditions:

- \$100,000 personal recognizance bond co-signed by 2 financially responsible persons
- Travel restricted to SDNY/EDNY and the District of New Jersey
- Surrender travel documents and no new applications
- Pretrial supervision as directed by Pretrial Services ("PTS")
- Drug testing/treatment as directed by PTS
- Curfew with electronic monitoring, with the curfew hours and electronic monitoring equipment to be determined by PTS
- Defendant not to possess a firearm, weapon, or other destructive device
- Defendant to maintain or to seek employment
- Defendant not to possess identification information of other individuals
- Defendant not to open bank accounts or apply for credit cards/other lines of credit without the approval of PTS
- Defendant is not to have contact with co-defendants except in the presence of counsel

  
J. PAUL OETKEN  
United States District Judge